IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS CORPUS CHRISTI DIVISION

MOTION TO CONDUCT 11 USC SECTION 341 CREDITORS MEETING BY TELEPHONE

NOW COME, JOHN and PENNY WELLS, by and through their attorney of record, Jan L. Shephard, in the above styled Chapter 13 case, and files this Motion to Conduct 11 USC Section 341 Creditors Meeting by telephone. The Debtors have permanently moved to Las Vegas. The Debtors will be unable to attend their 341 Creditors Meeting.

WHEREFORE, the Debtors respectfully request that the Creditors Meeting be conducted by telephone.

Respectfully Submitted,

Jan L. Shephard

Attorney for Debtor

410 South Padre Island Dr. Ste. 210

Corpus Christi, Texas 78415

361/994-8410

Admissions No. 7629

State Bar No.18219385

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Motion to Conduct 11 USC Section 341 Creditors Meeting by Telephone mailed via U.S. Mail on the 13th day of March, 2006, postage prepaid, to the following parties:

TRUSTEES

Cindy Boudloche, Trustee 555 N. Carancahua, Suite 600 Corpus Christi, TX 78478

United States Trustee 515 Rusk, Suite 3516 Houston, TX 77002

DEBTORS

John Wells 3724 Cresthaven Las Vegas, NV 89147

> Jan L. Shephard Attorney for Debtor 410 South Padre Island Dr. Corpus Christi, Texas 78415 361/994-8410 Admissions No. 7629 State Bar No.18219385

AMERICAN CLASSIFIEDS PARADISE HOMES 1308 AIRLINE CC,TX 78412

AMEX 796310568017301761 PO BOX 297871 FORT LAUDERDALE, FL 33329

Aransas Pass Progress PARADISE HOMES THE INGLESIDE INDEX P.O. BOX 2100 ARANSAS PASS, TX 78335

ATTORNEY GENERAL OF TEXAS PO BOX 12548 AUSTIN, TX 78711

Barbara C. Jue, Trial Attorney Ofc. of U.S. Trustee 606 N. Carancahua, Ste. 1107 Corpus Christi, TX 78476

BEEVILLE PUBLISHINGS 04103740/PARADISE HOMES P.O BOX 10 BEEVILLE,TX 78102

BUCKINGHAM ESTATES COMMUNITY 7002 ADCOTE DR./WELLS P.O. BOX 1222 CORPUS CHRISTI, TEXAS 78468

CAP ONE BK 412174227586 PO BOX 85520 RICHMOND, VA 23285

CAPITAL 1 BK 486236229166 11013 W BROAD ST GLEN ALLEN, VA 23060 CAPITAL 1 BK 438864187901 11013 W BROAD ST GLEN ALLEN, VA 23060

CITIBANK USA 6035320164455675 PO BOX 9714 GRAY, TN 37615

City of Corpus Christi 2815665-46776 Attn: Jorge Cruz-Aedo 1201 Leopard Corpus Christi, TX 78469

City of Corpus Christi 421211-230982-PARADISE HOMES Attn: Jorge Cruz-Aedo 1201 Leopard Corpus Christi, TX 78469

COLORADO VALLEY BANK 6930000758 PO BOX 796 LA GRANGE, TX 78945

COLORADO VALLEY BANK 6111946161 PO BOX 796 LA GRANGE, TX 78945

COLORADO VALLEY BANK WELLS,XXX-XX-1502 PO BOX 796 LA GRANGE, TX 78945

CROSS COUNTRY BANK 422709708797 PO BOX 15371 WILMINGTON, DE 19850

DELL FINANCIAL SVCS 79450129033959340 12234 N IH 35 SB BLDG B AUSTIN, TX 78754 DELL FINANCIAL SVCS 79450129033747224 12234 N IH 35 SB BLDG B AUSTIN. TX 78754

DWAIN MCCAIN PLUMBING PARADISE HOMES P.O. BOX 10096 CORPUS CHRISTI, TEXAS 78460

ENTERGY ELECTRIC 4888718-PARADISE HOMES ENTERGY SOLUTIONS LTD. P.O. BOX 61071 NEW ORLEANS, LA 70161-1071

ENTERGY ELECTRIC 310961-WELLS ENTERGY SOLUTIONS LTD. P.O. BOX 61071 NEW ORLEANS, LA 70161-1071

G M A C 084904799017 PO BOX 2150 GREELEY, CO 80632

G M A C 084902279074 PO BOX 2150 GREELEY, CO 80632

GE Capital 4305068-001/PARADISE HOMES P.O. Box 5019 Rolling Mows, IL 60008

HSBC NV 5407912050748569 1441 SCHILLING PL SALINAS, CA 93901

HSBC NV 5440450055701803 1441 SCHILLING PL SALINAS, CA 93901 IRS SPECIAL PROCEDURES BRANCH/7 300 E. 8TH St. STOP 5026 AUS AUSTIN, TX 78701

IRS SPECIAL PROCEDURES/CH 7 XXX-XX-4402 P. O. BOX 21126 PHILADELPHIA, PA 19114

LANE MCDUFF OT-17765/PARADISE HOMES P.O 4986 DEPT 77 HOUSTON,TX 77210-4986

LINEBARGER GOGGAN BLAIR & SAMPSON LLP 900 ARION PARKWAY, SUITE 104 SAN ANTONIO, TX 78216

LOAN STAR INVESTMENTS WELLS, JOHN 2401 E. LUBBUCK Loveland, TX

LOWES/MBGA 798192444134 PO BOX 103065 ROSWELL, GA 30076

LOWES/MBGA 798192444221 PO BOX 103065 ROSWELL, GA 30076

MEMBERS FIRST CREDIT U 8453050007 5444 S STAPLES ST CORPUS CHRISTI, TX 78411

NATIONAL CITY MORTGAGE 4333493802 PO BOX 1820 DAYTON, OH 45401 Northern Leasing Systems, Inc. 0386150/PARADISE HOMES 132 WEST 31ST STREET, 14TH FLOOR New York, NY 10001-5095

NUECES COUNTY TAX ASSESOR P.O. BOX 2810 CORPUS CHRISTI, TX 78403-2810

PROVIDIAN 6454003546 4900 JOHNSON DR PLEASANTON, CA 94588

PROVIDIAN 4031-1423-0062-6673 4900 JOHNSON DR PLEASANTON, CA 94588

RADIOLOGY IMAGING OF SOUTH TEXAS 198399-QRAD5 3226 REID CORPUS CHRISTI, TX 78404

SBC 36198039964309 PO Box 4845 Houston TX 77097-0080

STATE COMPTROLLER 111 E. 17TH ST. AUSTIN, TX 78774-0100

TIME WARNER 8262850130820917 4200 INTERNATIONAL PKWY Carrollton, TX 75007

TNB TARGET 4352373361796243 PO BOX 9475 MINNEAPOLIS, MN 55440

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U.S. TRUSTEE 606 N. CARANCAHUA, STE. 1107 CORPUS CHRISTI, TX 78476

University Medical Center M2336111 P.O. Box 5980 Lubbock, TX 79408-5980

WASHMTL/PROV 2300626673 4940 JOHNSON DR PLEASANTON, CA 94566